

# DATA PROTECTION & PRIVACY POLICY

## 1 Introduction

Broad Hinton and Winterbourne Bassett Parish Council (“the Council”) is the first tier of local government and is registered as a **Data Controller** with the Information Commissioner’s Office (ICO).

The Council is committed to protecting your privacy and handling your personal data openly, lawfully, and responsibly. This policy explains **how and why we collect, use, store, and protect your personal information**, in line with:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Freedom of Information Act 2000

This policy is written in plain language, in line with **NALC and ICO guidance**, and applies to residents, businesses, contractors, volunteers, councillors, and staff.

## 2 What this policy covers

This policy explains:

- What personal data we collect
- How we use it and why
- How long we keep it
- How we keep it secure
- Your legal rights

It applies to **all records**, whether held on paper, electronically, by email, or in cloud-based systems.

## 3 Who is responsible for your data

### 3.1 The Data Controller

Broad Hinton and Winterbourne Bassett Parish Council is responsible for deciding how your personal data is processed.

### 3.2 Data Protection Officer (DPO)

The Parish Clerk is the Council’s designated Data Protection Officer and is responsible for:

- Ensuring the Council complies with data protection law

- Advising councillors and staff on their responsibilities
- Acting as the main contact for residents and the ICO

All councillors, staff, and volunteers who handle personal data must follow this policy and keep your information confidential.

## 4 How we must handle your personal data

Data protection law says that your personal data must be:

1. Used lawfully, fairly, and transparently
2. Collected only for specific and legitimate purposes
3. Relevant and limited to what is necessary
4. Accurate and kept up to date
5. Kept only as long as necessary
6. Kept safe and secure

These principles underpin everything the Council does when handling personal data.

## 5 What personal data we collect

Depending on your interaction with the Council, we may collect:

- **Identity details** – name, title
- **Contact details** – address, email address, telephone number
- **Financial information** – bank details (for payments, grants, or reimbursements)
- **Transaction records** – payments made to or received from you
- **Public and statutory information** – planning applications, consultation responses, electoral or legal records
- **Employment-related information** – where applicable

We only collect what we need and do not collect unnecessary personal information.

## 6 Why we use your data (lawful basis)

We only use your personal data when the law allows us to. This is usually because:

- **Public task** – we need it to carry out our statutory or official duties
- **Legal obligation** – the law requires us to process it
- **Contract** – we need it to deliver a service or agreement
- **Consent** – you have given clear permission for a specific purpose

Your personal data will **never be used for political purposes** unless you have explicitly consented.

## 7 Being open with you

When we collect your personal data, we will explain:

- Why we need it
- How it will be used
- How long it will be kept
- Who it may be shared with

We will only use your information for the purpose it was provided.

## 8 How we keep your data secure

The Council takes data security seriously and uses appropriate safeguards, including:

- Limiting access to authorised councillors and staff only
- Password-protected computer systems
- Secure storage for paper records
- Regular back-ups of electronic data

If a data breach occurs, it will be investigated and reported to the ICO where required.

## 9 How long we keep information (records retention)

We keep personal data only for as long as necessary. Our main retention periods are:

Record Type	How long we keep it
Council meeting minutes	Permanent
Annual accounts and audits	Permanent
Deeds and leases	Permanent
Insurance policies	40 years
Employee and volunteer records	6 years after employment or volunteer ends
Planning consultations	Until a decision is made
Invoices and receipts	6 years
General correspondence	2 years
Allotment records	6 years after tenancy ends
Accident records	3 years from last entry

## 10 Storage, archival and disposal

### 10.1 Storage

- Paper records are kept securely in locked storage
- Electronic records are password-protected and access-controlled

### 10.2 Archiving

- Historic records, such as old council minutes, may be transferred to the **Wiltshire & Swindon History Centre**

### 10.3 Disposal

- Paper records are securely shredded
- Electronic records are permanently deleted
- Old IT equipment is securely wiped or destroyed

## 11 Your rights

Under data protection law, you have the right to:

- Ask for a copy of your personal data
- Ask us to correct inaccurate information
- Ask us to delete your data (where applicable)
- Object to or restrict how your data is used
- Withdraw consent at any time (where consent applies)

Requests are usually handled within **one month**.

## 12 Freedom of information (FOI)

You can ask for non-personal information under the Freedom of Information Act 2000. The Council maintains records so requests can be answered within statutory time limits.

## 13 Policy review

This policy will be reviewed every 2 years to ensure it remains compliant with the latest legislation and the needs of the Parish Council.

## 14 Contact details

If you have any questions about this privacy policy or our privacy practices, please contact our Clerk:

Parish Clerk / Data Protection Officer: Peter Barry

## BROAD HINTON AND WINTERBOURNE BASSETT PARISH COUNCIL

Address: The Old Coffee House, Broad Hinton, SN4 9PQ

Email: [clerk@bhwbparchcouncil.org.uk](mailto:clerk@bhwbparchcouncil.org.uk)

Phone: 07860 407585

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)).

**Adopted by the Council:** 6 January 2025

Chairman: \_\_\_\_\_ Date: \_\_\_\_\_